

# **Exhibit N**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; *et al.*,

*Defendants.*

Civil Action No.

**DECLARATION OF M.V.**

I, M.V., hereby declare and state and follows:

1. I am over 18 years of age, of sound mind, and in all respects competent to testify.
2. I have personal knowledge of the facts set forth in this declaration and would testify competently to those facts if called to do so.
3. I am the mother of three children and live in the State of Maryland.
4. One of my children, P.V., is currently 17 ½ years old.
5. P.V. and I are members of PFLAG National.
6. P.V. is a unique, bright, and determined young adult.
7. P.V. is an honors student who is a senior in high school. P.V. has taken and excelled in A.P. classes at high school. P.V. is also taking and excelling in college classes at our local community college while still a high school student.
8. P.V. has been accepted to a number of different colleges. While P.V. is in the process of choosing which college to attend, P.V. has already chosen to major in chemistry and has been offered merit scholarships from multiple colleges both within the State of Maryland and outside the State of Maryland.

9. Through the college application and selection process, I have been impressed by P.V.'s clear sense of self and considered maturity in making choices about college and the future.

10. This is consistent with who P.V. has always been as a person. For as long as I can remember, P.V. has had a strong, consistent, and clear sense of self to a degree that has been notable to all who know and love P.V.

11. Since early childhood, I and others have described P.V. as "persistently P.V." By this I mean that P.V. at core has a sense of self that is not swayed easily by the opinions of others or the outside world. While P.V. is respectful of others and considers thoughtfully the views of others, P.V.'s own core views do not bend readily to peer pressure or outside influence when such views do not align with who P.V. is and what P.V. believes at core.

12. As a parent, I have sometimes jokingly wished that P.V. would be a little less "quietly determined" and "persistently P.V.", but in truth I deeply admire P.V.'s sense of self and knowledge of who P.V. is at core regardless of who others would like P.V. to be.

13. P.V. is unfortunately not new to medical care and treatment. P.V. has had multiple medical diagnoses requiring ongoing medical treatment since the age of two. In particular, some of P.V.'s medical conditions have required a maturity beyond P.V.'s years. Specifically, P.V. has been required to take responsibility for and carry lifesaving medication since a young age.

14. Since at least 2019, if not earlier, it was clear to me, as a mother, that P.V. identified as female. And in so many ways, this reality scared me. I was afraid of how the world would view P.V. I was afraid how other family members would react. I was afraid P.V. would be rejected and broken by a world that would not understand. I was afraid that the truth of P.V.'s gender identity would put P.V. at risk. Put simply, I was terrified.

15. However, seeing the pain with which P.V. interacted when not allowed to be true to P.V.'s own sense of self soon showed me that P.V. was at risk regardless. Not seeking medical treatment soon became the riskier choice.

16. It was hard watching P.V. express pain at people taking pictures, and with having to hear recordings of P.V.'s own voice because those pictures and recordings did not match P.V.'s own sense of who P.V. truly was. If not able to be true to P.V.'s self, P.V. preferred to disappear altogether. P.V. retreated from others universally. To be clear, P.V. is not someone who loudly proclaims anything about P.V.'s sense of self. Instead, it was a quiet, steady, and immutable reality.

17. After much soul searching, we made an appointment at Johns Hopkins to ascertain whether P.V. needed and would benefit from gender-affirming care. This was not an easy step or an easy process. It took courage for all of us.

18. On the basis of extensive communication with P.V. and with social workers and doctors, P.V. was diagnosed with gender dysphoria. While many years ago this would have been an incredibly hard diagnosis for me to hear, the diagnosis was a relief because it was confirmation of what was so clear to everyone around P.V.

19. P.V.'s physicians had extensive communication with P.V., with me, and with a social worker, and the entire care team carefully considered and discussed risks and side effects before concluding that starting hormone treatment was an appropriate course of medical treatment for P.V.

20. P.V. began hormone treatment in June of 2024. P.V. showed maturity and clarity, taking responsibility for communicating, with parental supervision, with providers, discussing dosages, and researching all aspects of treatment.

21. By October 2024, five months into hormone treatment, there was an extraordinary change in P.V. – ironically not so much in appearance as of yet but in the way P.V. interacted with the world. P.V. for the first time, started seeking out communication with others, making friends, and interacting at school. It was as if P.V. had been holding their breath for a lifetime and finally exhaled.

22. And now, with the issuance of Executive Order 14187, titled “Protecting Children from Chemical and Surgical Mutilation,” on January 28, 2025, everything is at risk. P.V. is four months away from adulthood and despite the reality that P.V.’s diagnosis and current treatment plan is the result of lengthy collaboration with multiple professionals including doctors and social workers, the President’s Executive Order purports to strip away the considered judgment of all those who have assisted in the medical treatment plan.

23. P.V., I, and P.V.’s treatment team all agree that gender affirming care is not only appropriate for P.V. but is necessary for P.V. as a human being. While I will always fear that P.V. will be unsafe in the world because of gender identity, I am more afraid that absent the care the medical team and experts and I all concluded was necessary, that P.V. is more at risk.

24. I cannot conceive of someone who has never sat up all night with this young adult and who has not spoken with their care team and wrestled with these difficult realities up close having the ability to strip this young adult of the personhood this care has affirmed.

25. I cannot adequately explain the fear – the fear that this Executive Order strips medical decisionmaking from P.V.’s care team as health professionals, from me as the parent, and from P.V. as a soon to be adult. Nor can I properly put into words how the loss of this care puts P.V. at imminent risk both medically and emotionally.

26. I am a member of PFLAG both at the national and local level because as a parent, I need to be able to stand up for P.V.'s personhood and for my family's right to make medical decisions affecting P.V. based on diagnosis and medical need.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 2nd day of February 2025.

*MV*

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M.V.